

REMARKS

Claims 13, 15-19, 32-45 and 47 are pending in the present application. Claim 13 is amended. Claim 33 is cancelled. Reconsideration in view of the following arguments is respectfully requested.

Rejections under 35 U.S.C. §103(a)

Claims 13, 15-19, 32-45 and 47 are rejected under 35 U.S.C. 103(a) as being unpatentable over Connolly et al. (U.S. Patent No. 5,657,375) in view of Sayers et al (U.S. Patent No. 6,539,237. Applicant respectfully traverses.

The Examiner alleges that Connolly et al. discloses all the features of claim 13, except the reference

“fail to expressly teach wherein the first radio cell coverage area is the first wireless system and the second radio cell coverage area is the second wireless system. However in analogous art, Sayers et al. teach wherein the first radio cell coverage area (fig. 1, cell 11) is the first wireless system (fig. 1, public wireless network 15) and the second radio cell coverage area (Fig. 1, cell 11’) is the second wireless system (fig. 1, private wireless network 14).”

Initially, Connolly does not illustrate or disclose a hybrid system including both a first and a second wireless system. Col. 5, lines 5-22, relied on by the Examiner, does not specify what can be understood as a first wireless system and what is the second wireless system. Applicants submit that Connolly et al. only discloses switch networks including means for connecting the digital network to each of a radio cell base station means to a single switched network (or public switched telephone network). In other words, only a single wireless system is described in Connolly et al. Therefore, Connolly et al. fails to teach or suggest a first wireless system and a second wireless system, as recited in claim 13 and similarly recited in claims 32, 38 and 44.

A common definition for “cell coverage area” is:

Cell is a geographic area including a signal range from one base station (a site containing a radio transmitter/receiver and network communication equipment). Wireless transmission networks are comprised of many hexagonal, overlapping cell sites to efficiently use radio spectrum for wireless transmissions.

In other words, a cell coverage area is a physical area covered by a single base station, and wherein cells may be contained within a wireless system. On the other hand, a common definition for a “wireless system” is:

A system primarily designed to transfer voice and or data from one point to one or more other points, (multipoint). Many systems make use of some wireless technologies as a transport medium. Examples of wireless systems include cellular, personal communication service, (PCS), paging, wireless data, satellite, and broadcast radio and television.

The Examiner alleges that first and second radio cell coverage areas as disclosed in Connolly et al. is analogous first and second wireless systems as taught by Sayers et al. Applicants disagree.

FIG. 1 of Sayers et al. illustrates a “communication system” including a public network 15 and a private network 14, and within each network is cell coverage areas 11 and 11’, respectively. But as can be clearly seen in FIG. 1 and Applicants remarks above, a cell coverage area is contained within a wireless system. In other words, a cell area is a **sub-component** of a wireless system. By definition and as known to a person of ordinary skill, a cell area is not analogous to a wireless system.

As recognized and admitted by the Examiner, Connolly et al. fails to disclose a first wireless network and a second wireless network. In addition, for the reasons discussed above, Sayers et al. fails to cure the deficiency of Connolly et al. Even if combined, the two references fail to teach or suggest a first wireless system and a second wireless system recited in claim 13. Accordingly, claim 13 is patentable over the Examiner’s cited art. Claims 14-19,

which depend on claim 13, are also patentable for the same reasons given above with respect to the patentability of claim 13 and for additional limitations recited thereby.

Independent claims 32, 38, and 44, which somewhat similarly recite features of claim 13, are also patentable for the same reasons given above with respect to the patentability of claim 13. Claims 34-37, 39-43, 45, and 47 should be indicated as allowable for depending on allowable independent claims.

CONCLUSION

In view of the above amendments and remarks, reconsideration and withdrawal of all presently outstanding rejections is respectfully requested.

In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact the undersigned at (703) 668-8000 in the Washington, D.C. area, to discuss this application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. 1.16 or under 37 C.F.R. 1.17; particularly, extension of time fees.

Respectfully submitted,

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